

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA



\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Zachary Knotts  
(Enter above the full name of the plaintiff  
or plaintiffs in this action).

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3465516  
(Inmate Reg. # of each Plaintiff)

**VERSUS**

**CIVIL ACTION NO.** 2:22-CV-00469  
(Number to be assigned by Court)

Judge Jennifer Bailey  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Enter above the full name of the defendant  
or defendants in this action)

**COMPLAINT**

**I. Previous Lawsuits**

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes X No \_\_\_\_\_

- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: Zachary Knotts and Ellen Heine

Defendants: Judge Jennite Bailey

2. Court (if federal court, name the district; if state court, name the county);

southern district of WV

3. Docket Number: 22-cv-0416

4. Name of judge to whom case was assigned:

Judge Tinsley

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

pending, No determination of if an inmate in USA

should get an attorney while in jail after his counsel withdrawn and have left zachary the plaintiff in jail for 6 months with no hearing why he was arrested

6. Approximate date of filing lawsuit: 9-27-22

7. Approximate date of disposition: \_\_\_\_\_

II. Place of Present Confinement: SCRJ

A. Is there a prisoner grievance procedure in this institution?

Yes \_\_\_\_\_ No X

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes \_\_\_\_\_ No X

C. If you answer is YES:

1. What steps did you take? \_\_\_\_\_

\_\_\_\_\_

2. What was the result? \_\_\_\_\_

\_\_\_\_\_

D. If your answer is NO, explain why not: The defendant is from

Charlottesville and a grievance will do no good

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Zachary Knotts 3465516

Address: 1001 Centreway Charleston WV 25309

B. Additional Plaintiff(s) and Address(es): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: Judge Jennifer Baily  
 is employed as: Judge  
 at Kanawha Co. Circuit Court 111 Court St, Charleston, WV 25301

D. Additional defendants: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

#### IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

<sup>8-1-22 and 10-14-22</sup>  
Jennifer Baily <sup>↑</sup> 2x has violated my US constitutional rights to freedom of press  
and freedom of speech. Civil rights were created for personal protection and  
safety in the USA! My 5<sup>th</sup> amendment due process of law was violated I filed  
the plea with drawl first on my criminal cases in Kanawha Co. other 5<sup>th</sup> amendment  
violation was, there was no motion to merge 2 cases from 3 years apart, 2 separate  
locations, 2 different <sup>witnesses</sup> <sup>20F109 20F273 21F371</sup> of a case from 2019 and 2021. IF I Knew  
they were together in a plea, I'd never have signed it never ever! when WV  
<sup>Monica Schwartz</sup> hires a fired US Court prosecutor, Bad things like this will happen over  
charging people, there was a double jeopardy argument, I was indicted 2x on same

## IV. Statement of Claim (continued):

8 fake felonies with no evidence, I was not even in WV at the time of the criminal charges with no evidence, I was extradited from NJ, have to be tried where crime was committed. From 4-8-21 to 2-11-22 I was in jail with a 100,000\$ paid bond ten months I never should have been in jail. 5-11-22 I withdrew plea before revocation of plea on 5-12-22. I did such a good job typing all corruption, I was arrested 2 days later, when I withdrew plea, everything goes <sup>back</sup> original <sup>and</sup> my bond is paid. I should not have been in jail part 6 months. I do not feel safe near this judge without my constitutional rights! freedom of <sup>and</sup> press freedom of speech, so I can question witnesses myself, with stand by counsel recording me Live on FB for 1,000's of people to view and for this US Court Judge to watch on my youtube channel called Nutty Nutts

## V. Relief

See a tatchment for the rest pg 1-4

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

U.S. Court Judge,

Order the defendant Judge Jennifer Bailly who swore to uphold the USC at her affirmation of office to give me my civil rights to freedom of press and speech at an in person hearing to record. the one who had no consent to do a <sup>medical</sup> report on me and was paid 3,000\$ to just walk past me. Order Bailly to have my personal belongings from jail brought to the in person hearing, so I can use my cell camera to <sup>make a</sup> documentry of a WV court room hearing. to publish on my youtube channel and FB Live recording is the way ill do it so the Judge of this <sup>1983</sup> case can see the order <sup>he</sup> made comes true and see my intelligence. with the <sup>the</sup> questions I ask witnesses, prosecutor, and Bailly. Marks can record me I will record him. I could use his cell. <sup>but also</sup> Order Jennifer Bailly to go to dollar tree buy me an android C-port Charging cord and have a usb plug-in available for me to use at the hearing, that is in person so no civil rights violations happen. If this does not happen I ask this US court Judge to order investigation and arrest for 18 USC 242 deprivation of rights under Color of law, and order the FBI white collar crime investigation for Medicaid Fraud

V. Relief (continued)): <sup>3 things have to be entered by Jennife on this docket sheet</sup> she must enter personal belonging order also

If this Judge Bailly does not respond with an <sup>2</sup> in person court hearing <sup>order to change plea hearing following due process of law and plea revocation hearing same day</sup> and a <sup>3</sup> 1.25 dollar tree c-port android charging cord <sup>receipt</sup> to make sure I can get my freedom of press and speech. <sup>If no answer</sup> I demand this US Court Judge enters an FBI white collar crime investigation order for all these <sup>and proof of service by Fed. Judge</sup> felonies <sup>hate</sup> 18USC242, 18USC249 bias crime, and conspiracy of Medicaid fraud entered on this cases docket sheet, no one deserves <sup>an</sup> entrapment <sup>a</sup> set up by WV State officials <sup>or</sup> held in jail 6 months with no hearing and no effective counsel.

VII. Counsel

IF FBI can not do it  
send order to US Marshals  
With proof of service entered  
to stop 18USC242 felony activity  
that is a threat to the public

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:  
<sup>Bailly's order from this judge must say have a usb plug-in for cell on table of the court for Zachary's freedom of press and speech</sup>

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes \_\_\_\_\_ No X

If so, state the name(s) and address(es) of each lawyer contacted:

\_\_\_\_\_  
\_\_\_\_\_

If not, state your reasons: I've been trapped in jail 6 months can't get to my money to hire one. state will not give me effective counsel / I am a political prisoner

C. Have you previously had a lawyer representing you in a civil action in this court?

Yes \_\_\_\_\_ No X

If so, state the lawyer's name and address:

\_\_\_\_\_  
\_\_\_\_\_


Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10-17-22  
\_\_\_\_\_  
(Date)

  
\_\_\_\_\_  
Signature of Movant/Plaintiff

\_\_\_\_\_  
Signature of Attorney  
(if any)



1-4

There is no WV state statute for order she made, public and this US court need to see proof of Medicaid Medicare fraud she's a conspirator to Freedom of press will get you this criminal evidence of federal fraud

US Court Judge on youtube. find me to see your order <sup>is</sup> fulfilled  
 Nutty Nutts <sup>my</sup> pic is a blue hard hat with iceberg pic or type WV welfare  
 Crackheads apartment, you'll find me subscribe, bell, all, <sup>and</sup> you Judge will see how  
 profesional I can be in a court room, believe me I will be in order to  
 collect evidence for future legal actions, this Judge has caused alot of  
bodily harm to me <sup>she</sup> used my body for Medicaid fraud. 9-9-22 I was beat  
 naked by jail staff pod A5 cells carried out of jail, forced into a RICO crime  
 scene, 9-9-22 seizure from stress this Judge caused, I was logged out of the <sup>WV</sup> DCS,  
 from 9-9-22 to 9-21-22 my body was used for fraud of Medicaid 750\$ a day. I never  
 did one vital sign, never swallowed one pill, never went to one doctor at the  
 RICO crime scene. Case 2:21-cv-00176 shows <sup>\$</sup> 818,532.80 of bills with no record.  
 This Judge Bailly paid a sycologist Tim Sarrs near 3,000\$ to just walk  
 past me. He had no consent to treat me, no consent to do a report, no consent  
 to be paid. <sup>on</sup> 9-16-22 @ 9:30am <sup>with 1 day area</sup> Sharpe hospital. <sup>is when</sup> this fraudulent scam crime  
 happened. Attorney Mark Plants <sup>was told</sup> on 10-15-22 by global tel link jail  
 phone all dates and times of abuse this defendant Bailly caused <sup>that</sup> my body  
 Judge Bailly, Just made an order to steal more Medicaid fraud, for up to  
 90 days of 750\$ a day theft of Medicaid, I will not see one doctor  
 I will not do anything medically related. I do not need it, I will refuse  
 everything. This is a serious threat to my body and the Medicaid funds  
of America. I do not qualify for Medicaid, <sup>Bailly</sup> she knows this from case  
 2:22-cv-0416. this is criminal activity conspiracy to fraudulent scam felony  
 Mark Plants 304-767-8523 recorded call said he would file a motion for a true  
 expert witness from Clayman and associates Cody is his name, to do an actual  
 evaluation, he already did <sup>one</sup> he knows I am fine, 8-17-21 he testified he will  
 have consent to do a report, I'll have my attorney present, by state law  
 I have rights to be at a competency hearing, I want to be present at court  
 to use freedom of press to show public all Medicaid fraud going on  
 and I need <sup>a</sup> camera on this Judge and witnesses, inside a courtroom, I  
 am concerned about her cognition, cognitive abilities for not  
 answering one motion. since when she was assigned 7-11-22 leaving  
 me in jail so long with no hearing, not giving me an attorney 25<sup>th</sup>  
 amendment should apply to her, my bond is paid I should not



Greatest best case law in USA for proof you can sue anyone for anything is MI state Supreme Court case a man sued a man for a bag of beans. Yahoo.com or google this to find case # WV jail has no PC or law library for 600 people @ SCRJ 2-4

be in jail I filed <sup>a</sup> plea with drawl first, Bailly <sup>is</sup> acting as a Judge and witness at <sup>the</sup> same time <sup>this</sup> is not allowed, this needs to be recorded, for public to see her making up her own state laws, <sup>this</sup> needs to be shown, to the public, there is no state law that says she can do anything she is doing. Civil rights of freedom of press and speech inside a court room, will protect my body from unlawfulness and criminal activity Bailly is doing as a Judge. this case is for personal and public safety, that her unlawfulness is a threat to, I never committed a crime prosecutor said it herself on record, after she danced a cheer leading move <sup>shouted yes!</sup> this is on record, I am on a mission to protect the public, I made a big difference <sup>I</sup> changed laws in WV Senate bill 702 introduced same day my RICO case was entered on 3-22-21, I need civil rights to protect public from Bailly and protect my self, from her Camera is for safety, I was robbed by Belinda Mundy who typed transcripts 3x she defrauded me, I paid for her goods and services but was robbed!

the most needed and important parts 3x are missing, I paid for these transcripts myself, I can not enter Kanawha Co. Circuit Court with out freedom of press and speech, my 14<sup>th</sup>, 8<sup>th</sup>, 5<sup>th</sup> amendments were violated, but first amendment will protect me the most 10-15-22 Mark Plants answered the first call from me in 6 months to his cell <sup>and</sup> said he'd file a motion to get Cody the <sup>to go</sup> psychologist to do an evaluation, he is so close to this jail, there is no reason to force me 2 hours from jail into the RICO crime scene, to steal medicaid fraud using my social security #, by logging me out of the WV D.O.C., this is how the criminal organization WVU medicaid and WV D.H.H.R. steal over 54 million a year, case 2:21-cv-00176 proves this, I do not want my body used for any more fed. fraud, freedom of press is <sup>the</sup> only way to stop it at an in person hearing, Ineffective with drew counsel Mark Plants, lied to me about the plea, camera would have proved this, I tried to get all audios of my case <sup>but</sup> First Judge Carrie Webster broke laws will not give them to me, under WV law 29-b-1-1 FOIA law, I want to impress this US Court Judge

by asking witnesses, prosecutor, Judge all on camera questions and impress 1,000's of views on youtube, Camera at <sup>an</sup> in person hearing and me speaking will do it, with First Amendment, Mark Plants said on 10-15-22 ~~that~~ that he would collect all camera footage of bodily harm this Judge



3-4

witness <sup>in state court</sup> and defendant <sup>here</sup> has caused to my body, I want freedom of press to show <sup>the</sup> public at the in person hearing. she paid a not expert witness near 3,000\$ to just walk past me 9-16-22 9:30am CI day area I want public to see me beat naked all this to be forced into RICO Medicaid fraud. 9-9-22 left of CI nurse station seizure I was <sup>un</sup>consent public needs to see me <sup>be</sup> over dosed on drugs not even made for a seizure Thorazine <sup>shot</sup> leading to right of CI nurse station I was so over dosed I could not walk right before this, at entrance of the RICO the CEO Patrick Ryan who I am suing forced me into Medicaid fraud! all this abuse has caused bodily harm WV Prosecutor said on record I never threatened anyone, she over charged me, I've been in jail total of 17 months for no crime. 20F273 was to be dismissed 8 fake felonies it was to be NO part of a plea. 20F371 was to be a plea but she <sup>prosecutor</sup> danced shouted YES! because it was entrapment of where I'm at now, for rules of plea I followed I subpoena <sup>this</sup> plea on case 2:22-cv-0416 I called WVCPD 304.558.9911 more than 1x on 5-11-22 @ 12:37 plea never said pre arrange a time with capital police, <sup>Not</sup> more than any amount of time! like call 3 hours before you show up, I had their permission to come so I did. I need civil rights in a court room and a with drawl of a plea, that I have rights to, my typed version shows all this entered 5-11-22 I need a change plea hearing to not guilty as Monica the fired for over charging innocent people as a fed prosecutor said herself after ten months of jail that I was not guilty on 12-13-21 <sup>she</sup> read my own words said this is not a threat, I <sup>had</sup> told Mark same thing, before plea hearing he told me on record, I had to plead guilty she just wants you to do this. No one deserves this long in jail with paid bond, <sup>and take</sup> corruption and abuse. I fear the RICO so much cuz USDOJ, sued Ely Lilly, the owner of Zyrxera <sup>drug</sup> for 1.5 Billion \$ They abuse people with this poison Ely was sued for misuse of med, my penis for 14 days did not work Aug. 4-17 of 2021 being forced on this by ten people holding me down I was sexually abused used for fraud 200 others are abused for fraud. <sup>I</sup> never seen a doctor. I am not ill at all. I need <sup>a</sup> camera to protect my self from this dangerous public <sup>Threat</sup> safety Judge Bailey she is a threat to my health, cameras Mark is to get will prove bodily harm I've suffered there needs to be by law a plea revocation hearing, If I was violating probation, why was I not given by WV law a 30 day sentence to jail, when I seen P.O. on 5-9-22 probation violations was from 4-27-22 camera is needed to find answers to this corruption and entrapment. paying someone 3,000\$ to walk past me not answering <sup>any</sup> motion in 4 months, not having a hearing in person to show evidence is a public safety threat.



Help me save my life from Mark Plants  
 \* Ineffective counsel will not give me or my legal power of attorney Ellen Heine  
 the forged no consent fraudulent scam competency evaluation Mark is going to hurt me he is planning to hurt me, I know it

4-4

Other reason a camera is so important is I am in fear of what my with drew counsel might do. He was so mad when I would not sign first plea where I knew 8 fake felony case 20F273 was in it. I'll get jail camera behind glass camera of this one day. I was punching glass saying No I'll not sign plea to 20F273. Then my own attorney begging me not to withdraw plea. then telling me on record I had to plea guilty she just wants you to do this, is 3 serious things that makes me believe he was part of this entrapment. add only one visit in going on six months. only one phone answer from 5-13-22 to 10-15-22 Then more proof ineffective counsel was in on it was lying to me telling me WV Capital police calls are not recorded. telling me in a court room cameras do not record these kind of lies anyone would be in fear of what ineffective counsel might intentionally do to make me be put away for life, to not win my civil cases from where I was beat, tortured, abused with drugs, I never needed or wanted for 1,258 days and no record to back up 818,532.80 of bills and I suffer from PTSD to this day from nightmares of abuse at the RICO, from 11 years ago all my problems in life is from what you see in case 2:21-cv-00176 not a TBI 20 year old injury, I need my Constitutional rights inside a court house, with a Judge who swore to uphold the USC but is not. I will feel safe with a camera in my hand, on my attorney. the defendant <sup>Bailly</sup> will not replace who is ineffective, I will feel safe and healthy not stressed by all this abuse of power. when I have a camera freedom of press on me as I use freedom of speech, questioning witness, prosecutor myself, to show the public. No civil rights. I'll be at a high risk of a seizure at court. Case 1:21-cv-0050 proves it's possible at court, but a camera will calm me down. I'll not be stressed so this is a health issue request for my civil rights, one day on my channel you'll hear. I'll call see me laying on floor of court house restroom. leg shaking all the abuse and threats of 20F273 has caused me 6 seizures. It was to be no part of a plea. I was forced to sign a plea manipulated into pleading guilty Mark Plants was prosecutor, ten years, lied for a living, lied me into signing. <sup>he</sup> was so aggressive day I signed. telling me on record I had to plea guilty I need civil rights ordered at an in person competency hearing and all other <sup>hearings</sup> of this court case. Since transcripts ~~were~~ were tampered with that I paid for. US Court Judge I pray you grant me my 14th amendment order Bailly to schedule a change plea hearing and order her to have me record it 412c

#65516  
200 Centre Way  
Charleston WV  
25309

US Court Clerk's office  
500 Virginia Street  
Charleston WV  
25301

25301-253900



CHARLESTON WV 250  
24 OCT 2022 PM 3 L



**South Central Regional Jail**

**1001 Centre Way**

**Charleston, WV 25309**